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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

FATHI ABDULRAHIM HARARA AND
NATIVE GROUNDS, LLC, d/b/a
JERUSALEM COFFEE HOUSE,

Defendants.

CASE NO. 3:25-CV-04849-SI

**STIPULATION TO STAY CASE;
DECLARATION; [PROPOSED] ORDER**

1 Subject to the Court's approval, Plaintiff and Defendants, through their undersigned counsel of
2 record, hereby stipulate as follows:

- 3 1. At midnight on September 30, 2025, the appropriations act that had been funding the
4 Department of Justice expired and appropriations to the Department lapsed. The date when
5 funding will be restored by Congress has not been established.
- 6 2. Plaintiff has conveyed the following to Defendant:
 - 7 a. An officer or employee of the United States who violates 31 U.S.C. § 1341(a)
8 (obligate/expend in excess or advance of appropriation), § 1342 (voluntary services
9 prohibition), or § 1517(a) (obligate/expend in excess of an apportionment or
10 administrative subdivision as specified in an agency's regulations) “*shall* be subject
11 to appropriate administrative discipline including, when circumstances warrant,
12 suspension from duty without pay or removal from office.” 31 U.S.C. §§ 1349(a),
13 1518 (emphasis added). Accordingly, each United States Attorney has been
14 instructed to designate those attorneys and support staff whose work is necessary to
15 sustain legal operations essential to the safety of human life and the protection of
16 property.
 - 17 b. The undersigned counsel is furloughed and is not permitted to work on the instant
18 case during the lapse in appropriations.
- 19 3. The parties therefore request a stay of this case for either: 30 days or when Congress has
20 restored appropriations to the Department of Justice and the government shutdown ends,
21 whichever occurs first. The parties further request that all deadlines, including currently
22 scheduled hearing dates, in this case be extended for a period commensurate with the
23 duration of the lapse in appropriations – *i.e.*, each deadline would be extended by the total
24 number of days of the lapse in appropriations.
- 25 4. If this stay is granted, the stay will end 30 days from the date the stay was granted or, if the
26 government shutdown ends in less than 30 days, counsel for the United States will promptly
27 notify the Court as soon as the government shutdown has ended and confer with opposing
28 counsel and submit within two weeks a revised joint proposed schedule, including

1 rescheduling the parties' case management conference currently scheduled for November 14,
2 2025.

3 IT IS SO STIPULATED.

4 Dated: October 31, 2025

Respectfully submitted,

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6 HARMEET K. DHILLON
7 Assistant Attorney General
8 Civil Rights Division

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10 MICHAEL E. GATES
11 Deputy Assistant Attorney General
12 Civil Rights Division

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20 Attorneys for Defendants

21 Attorneys for Plaintiff

1 **ECF ATTESTATION**

2 In accordance with Civil Local Rule 5(i)(3), I, Charlotte Lanvers, attest that I have obtained concurrence
3 in the filing of this document from all other signatories listed here.

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DECLARATION OF CHARLOTTE LANVERS

I, Charlotte Lanvers, declare and state as follows:

1. I am a Trial Attorney with the Civil Rights Division of the United States Department of Justice. I have personal knowledge of the matters set forth below, except those matters that are based on information and belief, which I believe to be true, and could and would testify competently to them if called to do so. I make this declaration in support of the parties' Stipulation to Stay Case, filed concurrently herewith.
2. I am furloughed and I am not permitted to work on the instant case during the lapse in appropriations.
3. On October 29, 2025, I contacted Defendant's counsel regarding this requested stay. Defendants' counsel graciously agreed to Plaintiff's request for a stay.
4. This request may have the effect of staying the Case Management Conference set for November 14th.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: October 31, 2025

/s/ Charlotte Lanvers

Charlotte Lanvers

1 **[PROPOSED] ORDER**

2 Pursuant to stipulation, IT IS SO ORDERED.

3 1. This case is stayed until Congress restores appropriations to the Department of Justice and
4 the government shutdown ends. All deadlines, including currently scheduled hearing dates,
5 in this case be extended for a period commensurate with the duration of the lapse in
6 appropriations – *i.e.*, each deadline would be extended by the total number of days of the
7 lapse in appropriations.

8 2. Counsel for the United States will promptly notify the Court as soon as the government
9 shutdown has ended and confer with opposing counsel and submit within two weeks a joint
10 proposed schedule for the remainder of litigation, including a proposed date to reschedule the
11 Case Management Conference currently set for November 14th.

12 DATED: _____

13 _____
14 HON. Susan Illston
Senior U.S. District Judge